UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROGER MOULTON,

Plaintiff,

v.

CREDIT PROTECTION ASSOCIATION, L.P.,

Defendant.

CIVIL ACTION NO. 1:15-cv-13077

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff, Roger Moulton ("Plaintiff"), and Defendant, Credit Protection Association, L.P. ("Defendant") jointly move for a 60-day extension of the current deadlines, and as grounds state as follows:

1. The underlying matter arises out of Plaintiff's claims under the Telephone Consumer Protection Act ("TCPA") and the Fair Debt Collection Practices Act ("FDCPA"). Plaintiff filed his Complaint against Defendant on or about August 3, 2015. (DE #1).

2. On or about September 3, 2015, Plaintiff filed his Amended Complaint. (DE #8).

3. On or about June 6, 2016, a scheduling conference was held after which time the Court entered a scheduling order. (DE #31). The scheduling order set the relevant deadlines as follows:

   a. All requests for production of documents and interrogatories served by August 26, 2016.

   b. All requests for admissions served by September 30, 2016.

   c. All depositions, other than expert depositions, completed by October 28, 2016.

   d. Fact Discovery to be completed by December 2, 2016,

e. Status conference set for November 14, 2016.

4. The parties have exchanged their Rule 26 disclosures. Furthermore, the parties have served their respective requests for production of documents, interrogatories and requests for admission. Defendant has responded to Plaintiff's discovery requests, but has not served the documents responsive to Plaintiff's discovery requests insofar as the materials contain confidential and sensitive third-party information the disclosure of which could subject Defendant to further liability.

5. On or about July 15, 2016, the parties filed a Joint Motion for Entry of Confidentiality Order. (DE #32). On or about September 7, 2016, the Written Assurance to the Confidentiality was added as an Exhibit. The motion is currently pending before the Court.

6. By agreement, the parties have agreed to exchange the responsive documents, and if approved, apply the protective order retroactively. The parties are also in the process of attempting to negotiate a settlement, but want to preserve their rights to conduct further discovery on their respective claims and defenses should settlement negotiations prove unsuccessful.

7. Therefore, the parties respectfully request that this Court enter an Order extending the current deadlines by 60 days as follows:

a. All requests for production of documents, interrogatories and requests for admissions to be served by **December 5, 2016**.

b. All depositions, other than expert depositions, completed by **January 5, 2016**.

c. Fact Discovery to be completed by **January 5, 2017**.

d. Status conference to be held at Court's discretion.

8. This is the parties' first request for an extension, and neither party will be prejudiced by the relief requested as both are jointly seeking an extension of the deadlines.

WHEREFORE, the Parties request that the Court enter an Order extending the current deadlines by 60 days as more fully set forth above, along with such other relief as this Court deems appropriate.

Respectfully submitted,
ROGER MOULTON,

By her Attorneys

*/s/ Jeremy M. Glapion*______________
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Respectfully submitted,
CREDIT PROTECTION
ASSOCIATION, LP

By Its Attorneys

*/s/ Andrew M. Schneiderman*________
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Dated: October 5, 2016.

CERTIFICATE OF SERVICE

I, Andrew M. Schneiderman, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ *Andrew M. Schneiderman*
Andrew M. Schneiderman